SOUTHERN DISTRICT OF NEW YORK	
BENJAMIN M. LAWSKY, Superintendent of Financial Services of the State of New York,	· x : : Case No.: 14 Civ. 2863 (CM)
Plaintiff,	:
-against-	: :
CONDOR CAPITAL CORPORATION and STEPHEN BARON,	: : NOTICE OF MOTION
Defendants.	:
-and-	:
WELLS FARGO BANK, N.A., as Agent for Certain Financial Institutions as Lenders,	
Intervenor.	:

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PLEASE TAKE NOTICE that upon the annexed declaration of Leah M. Campbell dated June 4, 2014 and the exhibits attached thereto, the annexed affidavit of Todd Baron, sworn to June 4, 2014, and the exhibits attached thereto, and the accompanying memorandum of law submitted by Defendants Condor Capital Corporation ("Condor") and Stephen Baron (collectively, "Defendants"), and all of the prior papers and proceedings had herein, Defendants hereby move this Court before the Honorable Colleen McMahon, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date and time designated by the Court, for an order modifying the Preliminary Injunction and Order Appointing Receiver entered against Defendants pursuant to Fed. R. Civ. P. 65(a), and granting such other and further relief as the Court deems appropriate.

Dated: June 4, 2014

New York, New York

By: /s/ Michael M. Rosensaft
Michael M. Rosensaft
Leah Mary Campbell

KATTEN MUCHIN ROSENMAN LLP 575 Madison Avenue New York, New York 10022-2585 (212) 940-8800 Attorneys for Defendants